## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

**CAITLIN WEATHERS** 

Plaintiff

v.

CIVIL ACTION NO. 4:22-cv-04085

HOUSTON METHODIST HOSPITAL, ET. AL.,

Defendants

## MOTION FOR DISCOVERY DISPUTE CONFERENCE

Plaintiff, Caitlin Weathers, files this MOTION for a VIRTUAL DISCOVERY DISPUTE CONFERENCE in response to MAG. JUDGE CHRISTINA BRYAN'S ORDER to Plaintiff's Motion for Virtual Hearing and Conferences. Defendant's Houston Methodist Hospital, Et. Al., have been demanding Plaintiff's depositions before responding to Plaintiff's requests for production served to Patrick Palmer on September 24, 2023—additionally, Houston Methodist Hospital, et al. Al has continued to push for dates for only Plaintiff to be deposed without offering reciprocity as to a date and time when the defendant will be available. Given the circumstances as to the defendant's failure to respond to production requests and properly withdraw according to TRCP 10, it is prejudiced at this time to require that Plaintiff first answer on a date for only Plaintiff to be deposed as though the case is still in previous stages of summary judgment. This case was remanded to the district court for the Defendants to file an Answer. The defendants have had beyond the prescribed time to Answer. At this junction, it is inappropriate to force Plaintiff to respond to depositions without agreeing to the court's orders, which have permitted Plaintiff to proceed virtually except for trial. For this reason, Plaintiff requests that a Virtual Discovery Dispute Conference be held so as to require the Defendants to

file a response to production requests prior to depositions, and that the Defendants agree to virtual depositions for both parties to be deposed – as the higher court has ordered that in no way should the law and justice constitute a one way street.

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## **Certificate of Service**

I certify that on May 11, 2025, a true and correct copy of Plaintiff, Caitlin Weathers' Reply in OPPOSITION to Defendants' Response in Opposition to Default Judgment was served on all counsel and parties of record by the Court's ECF filing system in accordance with the Federal Rules of Civil Procedure.

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